

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Chapter 11</b>
	§	
<b>STEWARD HEALTH CARE SYSTEM</b>	§	<b>Case No. 24-90213 (CML)</b>
<b>LLC, <i>et al.</i>,</b>	§	
	§	<b>(Jointly Administered)</b>
<b>Debtors.<sup>1</sup></b>	§	<b>Re: Docket Nos. 46, 113</b>
	§	

**NOTICE OF FILING OF (1) PROPOSED FINAL ORDER  
(I) AUTHORIZING THE DEBTORS TO (A) OBTAIN JUNIOR LIEN  
POSTPETITION FINANCING, (B) USE CASH COLLATERAL,  
AND (C) GRANT LIENS AND PROVIDE SUPERPRIORITY  
ADMINISTRATIVE EXPENSE CLAIMS; (II) GRANTING ADEQUATE  
PROTECTION TO CERTAIN PREPETITION SECURED PARTIES;  
(III) MODIFYING THE AUTOMATIC STAY; AND (IV) GRANTING  
RELATED RELIEF AND (2) DEBTOR-IN-POSSESSION CREDIT AGREEMENT**

**PLEASE TAKE NOTICE THAT**, on May 6, 2024, Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Junior Lien Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Certain Prepetition Secured Parties; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* (Docket No. 46) (the “**Motion**”).

**PLEASE TAKE FURTHER NOTICE THAT**, on May 7, 2024, the Court entered the *Interim Order (I) Authorizing the Debtors to (A) Obtain Junior Lien Postpetition Financing,*

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

*(B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Certain Prepetition Secured Parties; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* (Docket No. 113) (the “**Interim Order**”),<sup>2</sup> granting the relief requested in the Motion on an interim basis, as set forth therein.

**PLEASE TAKE FURTHER NOTICE THAT**, the Debtors hereby file the proposed *Final Order (I) Authorizing the Debtors to (A) Obtain Junior Lien Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Provide Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Certain Prepetition Secured Parties; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief*, attached hereto as **Exhibit A** (the “**Proposed Final Order**”), granting the relief requested in the Motion on a final basis, as set forth therein.

**PLEASE TAKE FURTHER NOTICE THAT**, on May 28, 2024, the Debtors entered into that certain *Debtor-in-Possession Credit Agreement*, attached as **Exhibit 1** to the Proposed Final Order.

**PLEASE TAKE FURTHER NOTICE THAT**, a redline of the Proposed Final Order marked against the Interim Order is attached hereto as **Exhibit B** (the “**Redline**”).

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Order.

**PLEASE TAKE FURTHER NOTICE THAT**, multiple parties filed objections and/or reservations of rights to the Motion (Docket Nos. 68, 71, 435, 443, 444, 445, 448, 449) (collectively, the “**Objections**”). The Debtors believe that the Proposed Final Order resolves the Objections, and the Debtors remain in discussion with certain parties with respect to their proposed reservation of rights. In addition, the Proposed Final Order reflects informal comments received from various parties in interest.

**PLEASE TAKE FURTHER NOTICE THAT**, the Debtors intend to request entry of the Proposed Final Order at the hearing on the Motion, which is currently scheduled for **June 3, 2024 at 1:00 P.M. (prevailing Central Time)**. The Debtors reserve all rights to alter, amend, update, or modify the Proposed Final Order at or prior to the hearing on the Motion.

Dated: May 31, 2024  
Houston, Texas

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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**Certificate of Service**

I hereby certify that on May 31, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' claims, noticing, and solicitation agent.

/s/ Clifford W. Carlson  
Clifford W. Carlson

**Exhibit A**

**Proposed Final Order**